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E-Filed on: June 10, 2009

5 Attorneys for Arnold Schrager
and Susan Stolowitz

6 **UNITED STATES BANKRUPTCY COURT**

7 **DISTRICT OF NEVADA**

8 In re

9 **KAREN BETH LIPTON,**

10 **Debtor.**

11 **TIMOTHY S. CORY, Chapter 7 Trustee,**

12 **Plaintiff,**

13 **v.**

14 **KAREN BETH LIPTON,**

15 **Defendant.**

Case No.: BK-S-08-19178 MKN

Chapter 7

Adv. Proc. No. 08-01386-MKN

**JOINDER IN TRUSTEE'S
MOTION FOR JUDGMENT ON
THE PLEADINGS**

Hearing Date: May 27, 2009

Hearing Time: 2:30 p.m.

17 Arnold Schrager and Susan Stolowitz, creditors in the above-entitled Chapter 7
18 bankruptcy case (collectively the "Creditors"), by and through their counsel, James D.
19 Greene, Esq., of Rice Silbey Reuther & Sullivan, LLP, hereby join in the Motion for
20 Judgment on the Pleadings ("Trustee's Motion"). As indicated in the Trustee's Motion,
21 the Debtor's conduct in this case has been reprehensible and granting her a discharge
22 would a gross injustice. For all of the reasons stated in the Trustee's Motion, Creditors
23 request that the Court grant the Trustee's Motion and deny the Debtor a discharge.

24 DATED this 10th day of June, 2009.

25 **RICE SILBEY REUTHER & SULLIVAN, LLP**

26 /s/ James D. Greene

27 James D. Greene, Esq.

28 3960 Howard Hughes Pkwy, Suite 700
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CERTIFICATE OF SERVICE

I am employed in Clark County. I am over the age of 18 and not a party to this action. My business address is 3960 Howard Hughes Parkway, Suite 700, Las Vegas, NV 89169.

On the June 10, 2009, I served the foregoing document(s), described as:

JOINDER IN TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN 1

- by placing the original a true copy thereof enclosed in a sealed envelope addressed as follows:

See attached list

- a. **ECF System** (*You must attach the "Notice of Electronic Filing", or list all persons and addresses and attach additional paper if necessary*)

b. **BY U.S. MAIL.** I deposited such envelope in the mail at Las Vegas, Nevada. The envelope(s) were mailed with postage thereon fully prepaid.

I am readily familiar with Rice Silbey Reuther & Sullivan, LLC practice of collection and processing correspondence for mailing. Under that practice, documents are deposited with the U.S. Postal Service on the same day which is stated in the proof of service, with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date stated in this proof of service.

- c. **BY PERSONAL SERVICE.** (*List persons and addresses. Attach additional paper if necessary*)
 - d. **BY DIRECT EMAIL (as opposed to through the ECF System)** (*List persons and email addresses. Attach additional paper if necessary*)
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(A declaration by the messenger must be attached to this Certificate of Service).

I declare under penalty of perjury that the foregoing is true and correct.

Date: June 10, 2009

/s/ Jeni Starley
An employee of Brownstein Hyatt Farber Schreck, LLP

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